

**PROOF OF SERVICE****SUMMONS AND COMPLAINT**

Case No. 13-98-NI

**TO PROCESS SERVER:** You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**☐ **OFFICER CERTIFICATE**

OR

☒ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

☒ I served personally a copy of the summons and complaint,

☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with \_\_\_\_\_

List all documents served with the Summons and Complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time
Cargotec Oyj	Please see attached	3/15/13

☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare that the statements above are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Mileage fee	Total fee
\$		\$	\$

Signature

Jenessa Moore

Name (type or print)

Legal Assistant

Title

Subscribed and sworn to before me on 5-16-13 Date, OAKLAND ACTING IN WAYNE County, Michigan.

My commission expires: 2-15-19 Date

Signature:

Notary public, State of Michigan, County of OAKLAND

Volanda Aguajardo Mendoza  
Deputy court clerk/Notary public

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_

Attachments

\_\_\_\_\_ on

Day, date, time

on behalf of \_\_\_\_\_

Signature

Approved, SCAO

Original - Court  
1st copy - Defendant2nd copy - Plaintiff  
3rd copy - Return

16 <sup>th</sup>	STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS AND COMPLAINT	CASE NO.  13-98-NI
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Court address

40 N. Main Street, Mt. Clemens, Michigan 48043

Court telephone no.

586-469-5150

Plaintiff's name(s), address(es) and telephone no(s).

JASON PRAVETTONE and  
DANIELLE PRAVETTONE

v


Defendant's name(s), address(es), and telephone no(s).

CARGOTEC OYJ

Plaintiff's attorney, bar no., address, and telephone no.

VEN R. JOHNSON (P39219)  
535 Griswold Street, Suite 2632  
Detroit, Michigan 48226  
(313) 324-8300**SUMMONS****NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to **file an answer with the court** and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued February 19, 2013	This summons expires August 30, 2013	Court clerk 
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\*This summons is invalid unless served on or before its expiration date.

This document must be sealed by the seal of the court.

**COMPLAINT**

Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

**Family Division Cases**☒ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in \_\_\_\_\_ Court.The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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**General Civil Cases**☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in \_\_\_\_\_ Court.The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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**VENUE**

Plaintiff(s) residence (include city, township, or village) City of Richmond, County of Macomb	Defendant(s) residence (include city, township, or village) County of Macomb
Place where action arose or business conducted County of Macomb	

January 10, 2013

Date

  
Signature of attorney/plaintiff VEN R. JOHNSON (P39219)

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you to fully participate in court proceedings, please contact the court immediately to make arrangements.

APS International Plaza • 7800 Glenroy Road  
Minneapolis, Minnesota 55439-3122  
PHONE: (952) 831-7776  
FAX: (952) 831-8150  
TOLL FREE: (800) 328-7171

## APS International, Ltd.

**Monday, April 15, 2013**

**JOHNSON LAW, PLC  
Mr. Steven D. Brock  
535 Griswold St., Ste. 2632  
Buhl Building  
Detroit, MI 48226**

***ENCLOSED IS THE RESPONSE TO YOUR REQUEST IN THIS MATTER.  
This does need to be filed with the court.***

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**APS File #:** 267623-0001  
**Your Ref #:** Pravettone  
**Case Name:** Pravettone v Cargotec Oyj  
**Defendant:** Cargotec Oyj  
**Country:** Finland  
**Person Served:** Antti Salmensuu  
**Title of Person Served (if applicable):**  
**Date Completed:** March 15, 2013

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**MOTION TO QUASH/DISMISS:** Although rare, should you receive a Motion or if defense counsel raises allegations of insufficient process, please notify APS as soon as possible, so that our Legal Department can assist you in preparing a response to the Motion.

We have enjoyed this opportunity to work with you and remain ready to further assist you with service of process or discovery both domestically and abroad.

Thank you for using APS International and the Civil Action Group!

Sincerely,

  
Jeff Karsten -- Ext: 341  
Email: [JKarsten@CivilActionGroup.com](mailto:JKarsten@CivilActionGroup.com)

  
[www.CivilActionGroup.com](http://www.CivilActionGroup.com)



## **Civil Action Group, Ltd.**

7800 Glenroy Road  
Minneapolis, MN 55439  
Phone: 952.831.7776  
Toll Free: 1.800.328.7171  
Fax: 952.831.8150  
Email: [cag@civildactiongroup.com](mailto:cag@civildactiongroup.com)  
[www.civildactiongroup.com](http://www.civildactiongroup.com)

### **Company Profile**

Civil Action Group, Ltd. is the largest full service legal support company in the world. Since 1968, CAG has provided the highest quality service to almost every large law firm in the U.S. This same superior level of service is provided to small and mid-size law firms, sole practitioners, corporations, insurance companies, and governmental agencies, both nationally and internationally. CAG was rated #1 by the U.S. Department of Justice for its technical capabilities, business design, and experience. CAG is in a unique position to provide the highest quality support services in today's legal market because we are managed and staffed by experienced lawyers, business executives, financial professionals, paralegals, and support staff who understand the necessity of professionalism and proficiency in serving client's needs.

### **Services**

CAG offers a wide array of legal support services under one roof and has earned the reputation as the "go to" company for completing these tasks professionally, efficiently, and cost-effectively. CAG services include:

- **National Service of Process**
- **International Service of Process**
- **Language Services—Translations and Interpreters**
- **Medical Records Retrieval and Document Repository**
- **Public & Private Records Retrieval**
- **Investigations, Surveillance, Fingerprinting**
- **Depositions, Court Reporting, & Videography**
- **Litigation Services Financing**
- **E-Discovery & Computer Forensics**

### **Areas of Expertise**

**International Service of Process** CAG has almost 30 years of experience dealing with issues relating to International Service of Process, in particular, the Hague Service Convention, Inter-American Convention, Letters Rogatory, Foreign Sovereign Immunities Act, and collection of Foreign Evidence. CAG has extensive knowledge and expertise in Country specific requirements not listed in the reservations/declarations/notifications for certain Hague Service Convention and Inter-American Convention countries; special requirements for certain Letter Rogatory countries; and Country specific restrictions that can affect service of U.S. legal documents in foreign countries; i.e., Japan's discovery restrictions, and Germany's objections to U.S. split recovery statutes as they relate to punitive damages.

**Translations** CAG's experienced translators can translate documents to and from almost any language in the world. Whether one page or 100,000 pages, CAG can accurately translate the document in a professional and expeditious manner. CAG can also provide high quality, court-ready English transcriptions. CAG is a Corporate Member of the *American Translators Association*.



**Document Retrieval** With no call centers, CAG offers a boutique approach to client communication, case interest, and service. CAG can retrieve all types of records, even those requiring authorization, including, but not limited to: medical records, itemized billing, radiology films/scans, pharmacy, employment, tax, workers comp, insurance, SSA, scholastic, and dental. CAG's Medical Records Inc. division has 40+ years of managerial experience in record retrieval coordination and procurement.

**Document Repository** The CAG HIPAA / FBI compliant on-line document repository is a valuable tool for accessing and sharing scanned images anywhere there is an internet connection. Our document storage platform uses a folder structure for easy navigation and is security set by user to cover the varying levels of access and usage.

**National Service of Process and Investigations** CAG has been providing fast, courteous, and cost-effective service of process in every U.S. state since 1968. No other process serving company can provide you with better nationwide service of process. In addition, CAG's investigative services can assist in locating defendants, witnesses and assets nationwide. Our professional, licensed, insured private investigators use state-of-the-art technology to investigate anybody, anything, anytime, anywhere!

**Computer Forensics and E-Discovery** Legal Computer Forensic Services, a division of CAG, provides professional forensic services to the legal community, governmental entities and the private sector. Our experienced digital evidence specialists, using the most advanced forensic hardware and software, can assist in e-discovery; electronic evidence recovery; computer forensic exams/reports; professional court testimony; data recovery; internet/email abuse investigations; identity theft occurrences; and employee computer analysis including supplemental evidential materials for civil cases, criminal cases, employment matters and corporate security issues. We ensure compliance with the collection, analysis, reporting, presentation and preservation of digital evidence.

## **Experience**

CAG, through its various operating divisions, has provided support services in some of the world's largest litigation projects, including:

- |  |                       |   |                         |
|--|-----------------------|---|-------------------------|
| - Chinese Drywall  | - Honda ATVs          | - Clerical Sex Abuse                            | - Securities Fraud      |
| - BP Oil Spill   | - Pedicle Screws      | - MCI Securities Litigation                     | - Artificial Sweeteners |
| - Toyota Recalls   | - Seatbelt Litigation | - Norplant / Yaz / Ortho Evra                   | - Pharmaceuticals       |
| - Breast Implants  | - Immunization        | - Chocolate Price Fixing                        | - Sulzer / Zimmer Hip   |
| - Stents   | - Silzone             | - Ebbers / WorldCom Fraud                       | - Fen Phen / Redux      |
| - HRT  | - Fosamax             | - Showa Denko (L-Tryptophan)                    | - Tobacco Litigation    |
| - Pacemakers   | - Avandia             | - Bridgestone / Firestone Tire Tread Separation |                         |
| - Mirapex  | - Rezulin             | - Refrigerant Compressors Antitrust Litigation  |                         |
| - Genetically Engineered Rice & Contamination Litigation |                       | - Asbestos & more!                              |                         |

## **The Civil Action Group of Corporate Entities**

Civil Action Group, Ltd., APS International, Ltd., Medical Records, Inc., Legal Computer Forensic Services, LLC, Civil Action Finance, Ltd., and Fingerprint International.



Civil Action Group, Ltd., 7800 Glenroy Road, Minneapolis, MN 55439

APPLICANT IS AUTHORIZED TO SERVE JUDICIAL PROCESS UNDER THE UNITED STATES FEDERAL RULES OF CIVIL PROCEDURE AND UNDER THE RULES OF CIVIL PROCEDURE OF THE STATE OF Michigan

**REQUEST  
FOR SERVICE ABROAD OF JUDICIAL OR EXTRAJUDICIAL DOCUMENTS**

**DEMANDE  
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ÉTRANGER  
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE**

Oikeusministeriö

Convention on the Service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965.

06. 03. 2013

Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Haye, le 15 Novembre 1965.

OM 52/721/2013

**Identity and address of the applicant**  
*Identité et adresse du requérant*

**Jeff J. Karsten**  
**APS INTERNATIONAL, LTD**  
**APS International Plaza**  
**7800 Glenroy Road**  
**Minneapolis, Minnesota 55439-3122**  
**U.S.A.**  
**Tel. 952.831.7776 Fax: 952.831.8150**  
**Email: JKarsten@CivilActionGroup.com**

**Address of receiving authority**  
*Adresse de l'autorité destinataire*

**MINISTRY OF JUSTICE**  
**Eteläesplanadi 10**  
**FIN-00130 Helsinki**  
**Finland**

The undersigned applicant has the honour to transmit -- in duplicate -- the documents listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,  
(identity and address)

*Le requérant soussigné a l'honneur de faire parvenir -- en double exemplaire -- à l'autorité destinataire les documents ci-dessous énumérés, en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savoir:*

(identité et adresse)

Cargotec Oyj

Porkkalankatu 5, FI-00501 Helsinki, Finland

☒ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.\*

a) selon les formes légales (article 5, alinéa premier, lettre a).

☐ (b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)\*:

b) selon la forme particulière suivante (article 5, alinéa premier, lettre b):

☐ (c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)\*.

c) le cas échéant, par remise simple (article 5, alinéa 2).

The authority is requested to return or to have returned to the applicant a copy of the documents -- and of the annexes\* -- with a certificate as provided on the reverse side.

*Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte -- et de ses annexes -- avec l'attestation figurant au verso.*

**List of documents**

*Énumération des pièces*

**Summary of the Document to be Served**

**Summons**

**Complaint and Jury Demand**

**Translations**

Done at

Fait à Minneapolis, Minnesota, U.S.A.

, the 1 March 2013

Signature and/or stamp.

Signature et/ou cachet.

APS INTERNATIONAL  
APS International Plaza  
7800 Glenroy Road  
Minneapolis, MN 55439

(Formerly OBD-116 which was formerly LAA-116,  
both of which may still be used)

USM-94

(Est. 11/22/77)

\* Delete if inappropriate.  
Rayer les mentions inutiles.

Case Name: Pravettone v. Cargotec Oyj  
 Defendant: Cargotec Oyj  
 Court Case No.: 13-98-NI

**CERTIFICATE  
 ATTESTATION**

OM 52/721/2013

The undersigned authority has the honour to certify, in conformity with article 6 of the Convention,  
 L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

**1) that the document has been served\***

**1. que la demande a été exécutée**

- the (date)
- le (date)
- at (place, street, number)
- à (localité, rue numéro)

15 March 2013  
 Helsinki

**- in one of the following methods authorised by article 5-**

~~- dans une des formes suivantes prévues à l'article 5:~~

- ☒ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention\*.  
 selon les formes légales (article 5, alinéa premier, lettre a).
- ☐ (b) in accordance with the following particular method\*:  
 selon la forme particulière suivante:

- ☐ (c) by delivery to the addressee, who accepted it voluntarily.\*  
 par remise simple

The documents referred to in the request have been delivered to:

Les documents mentionnés dans la demande ont été remis à:

- (identity and description of person)
- (identité et qualité de la personne)

Cargotec Oyj / by proxy Antti Salmensuu  
 in person

- relationship to the addressee (family, business or other):

- liens de parenté, de subordination o autres, avec le destinataire de l'acte:

**2) that the document has not been served, by reason of the following facts\*:**

**2. que la demande n'a pas été exécutée, en raison des faits suivants:**

In conformity with the second paragraph of article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement\*.

Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint.

LIST OF DOCUMENTS: Summary of the Document to be Served, Summons, Complaint and Jury Demand, Translations

Annexes

Annexes

Documents returned:

Pièces renvoyées:

In appropriate cases, documents establishing the service:

Le cas échéant, les documents justificatifs de l'exécution:

Done at Helsinki, the 22.3.2013  
 Fait à Helsinki, le 22.3.2013

Signature and/or stamp.  
 Signature et/ou cachet.

*[Signature]*

2

Legal Adviser Maija Heppä

267623 - 1

\* Delete if inappropriate.  
 Rayer les mentions inutiles.



HELSINKI DISTRICT COURT  
PORKKALANKATU 13  
00180 Helsinki

OM 52/721/2013

3.13.2013 00015668

CARGOTEC OYJ / EXECUTIVE BOARD

P1 61

00501 Helsinki

A Service of Notice has been filed for you at the District Court.  
Please contact the undersigned by 3.19.2013.  
or fetch the document from the following address.

Street address: Porkkalankatu 13, 00180 Helsinki.

Hours: Mon-Fri 8:00 am - 4:15 pm

Process server: OLIJSLAGER CHRISTOPHER  
Telephone: 029 5644924, 050 4121451  
christopher.olijslager@oikeus.fi

With the following power of attorney you may authorize another person to receive the service of notice on your behalf. An authorized representative must bring along the original power of attorney.

**POWER OF  
ATTORNEY**

I/we authorize Antti Salmensuu to receive writs of summons and services of notice addressed to our corporation.

CARGOTEC OYJ / EXECUTIVE BOARD

Helsinki 3.14.2013

Place and time

[signature] Outi Aaltonen

Assignor signature and name in block letters

holder of procuration

position in company/corporation

[signature] [Mikael illegible name]

Assignor signature and name in block letters

holder of procuration

position in company/corporation



HELSINGIN KÄRÄJÄOIKEUS  
PORKKALANKATU 13  
00180 Helsinki

OM 52/721/2013

13.3.2013

00015668



.0591

CARGOTEC OYJ / HALLITUS

P1 61

00501 Helsinki



Teille on tiedoksianto käräjäoikeudessa.  
Pyydän ottamaan yhteyttä allekirjoittaneeseen  
viimeistään 19.3.2013.  
tai noutamaan asiakirjan alla olevasta osoitteesta.

Käyntiosoite: Porkkalankatu 13, 00180 Helsinki.

Päivystys ma-pe klo 8.00 - 16.15

Haastemies: OLIJSLAGER CHRISTOPHER  
Puhelin: 029 5644924, 050 4121451  
christopher.olijslager@oikeus.fi

Voitte valtuuttaa alla olevalla valtakirjalla jonkun muun  
puolestanne vastaanottamaan tiedoksiannon.  
Valtuutetulla on oltava mukanaan alkuperäinen valtakirja.

POWER OF  
ATTORNEY

VALTAKIRJA

Valtuutan/valtuutamme Antti Salmensuu  
vastaanottamaan yhteisöllemme osoitettuja haasteita  
ja tiedoksiantoja.

CARGOTEC OYJ / HALLITUS

Helsinki 14.3.2013

Paikka ja aika

Outi Aaltonen

Outi Aaltonen

Valtuuttajan allekirjoitus ja nimen selvennys

prokuristi  
asema yhtiössä/yhteisössä

Mikael Mäkinen

Valtuuttajan allekirjoitus ja nimen selvennys

prokuristi  
asema yhtiössä/yhteisössä

110231, post 130313 (1) 130313 1239 cary8dk 1212jmw

12:11

cl/1

1:1

Y9DK-01049